



Mel Carnahan, Governor • David A. Shorr, Director

# DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

MAY 22 1995

**CERTIFIED MAIL:Z 062 476 566**  
**RETURN RECEIPT REQUESTED**

Mr. Chris Byrne  
Department of Health  
St. Louis County Air Pollution Control Program  
111 South Meramec  
Clayton, MO 63105

Dear Mr. Byrne:

This letter is in regard to the outcome of the April 12, 1995 meeting with my staff and your Air Pollution Control staff. During the meeting, it was requested that the interpretation of 10 CSR 10-5.330, the Surface Coating RACT rule be clarified by APCP in writing. The following are some issues that were addressed in the meeting:

1. Emission compliance limits for each coating line may be calculated based on a volume weighted average on a daily basis including wet on wet coatings. An example of a coating line in which a volume weighted daily average to determine compliance can be performed is when several topcoat coatings are applied in a spray booth or with several applicators on a conveyor. However, a combination of spray booths and conveyors, two or more spray booths, or two or more conveyers in parallel are considered to be more than one coating line. Therefore, volume weighted daily average can only be conducted for each spray booth or conveyor.
2. Any VOC emission point, such as clean up solvents or degreasing, that is taking part in the preparation and completion of all coatings, should be included in determination calculations for rule applicability.
3. The surface coating rule for the St. Louis area does not provide alternative emission limitations for sources that wish to comply with the rule by installing control devices. Sources that elect to comply with the rule through the use of control devices must receive approval from the APCP director.

Mr. Chris Byrne

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4. The Alternative Emission Limits (AEL) rule was not approved by EPA. Therefore, the rule is no longer effective. Please notify sources in your jurisdiction that will be affected by the AEL rule to seek alternative means of compliance.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Roger D. Randolph  
Director

RDR:jwb

c: Steve Feeler, APCP